

## REMARKS/ARGUMENTS

The amended listing of claims and the following arguments are presented generally to impart precision to the claims, by particularly pointing out and distinctly claiming the subject matter. The pending claims are supported by the specification. No new matter is added.

Claims 1-4, 6-9, 11-14, 16-20, 22-25 and 27-29 were rejected under 35 U.S.C. 102(e) as being anticipated by U.S. Patent No. 6,591,272 (hereinafter "Williams"). Claims 5, 10, 15, 21 and 26 were rejected under 35 U.S.C. 103(a) as being unpatentable over Williams in view of U.S. Patent No. 6,708,164 (hereinafter "Cseri"). Applicant respectfully disagrees.

New claims 30 and 31 are added. Claims 1-31 are currently pending.

Applicant respectfully submits that the currently pending claims are patentable over the cited references.

### Claim 1

Claim 1 was rejected under 35 U.S.C. 102(e) as being anticipated by Williams. Applicant respectfully disagrees. Applicant respectfully requests the consideration of the claim as a whole and the consideration of the relationships between elements of the claim.

Williams describes a number of operations related to a database and networked, persistent objects. Williams teaches that some of these database related operations are well known, such as "the process of interrogation of relational database schema" (Col. 2, lines 59-62, Williams) and "use of software to map objects from relations and data in relational database management systems or vice versa to object oriented applications" (Col. 3, lines 3-5, Williams). Williams describes "a method of communication of changes to existing objects from client computers and their conversion into updates to one or more rows so as to modify the rows of the appropriate tables in the corresponding databases in transactional mode" (Col.

5, lines 34-38, Williams). Williams describes certain aspects of “object insertions” (Col., 14, lines 2-4; Col. 25, lines 57-61, Williams).

However, Williams does not teach or suggest a systematic approach to update a database based on a number of instances of components. Specifically, Williams does not teach or suggest a method in which: a set of records of a database are first found matching an instance of a component of an object type; then instances of components of the object type that are corresponding to this set of records are used to update the set of records; and instances of components of the object type that are not corresponding to this set of records are used to insert new records. The portions of Williams relied upon for the rejection do not have the relationships between elements as recited in claim 1.

In claim 1, “a set of records” in the limitation of “finding a set of records ...” is the same as “the set of records” in the limitation of “updating the set of records ...”, corresponding to the records of the set of records” and the same as “the set of records” in the limitation of “inserting ... not matching records of the set of records”. Williams does not teach or suggest finding a set of database records matching an instance of a component of an object type, and then updating the same set of records using instances of components corresponding to this set of records, as claimed in the present invention.

In claim 1, “an object type” in the limitation of “finding ... an instance of a component of an object type” is the same as “the object type” in the limitation of “updating ... based on a first set of instances of components of the object type” and the same as “the object type” in the limitation of “inserting ... corresponding to a second set of instances of components of the object type, ...”. Williams does not teach or suggest finding a set of database records matching an instance of a component of an object type, and then inserting new records corresponding to a second set of instances of components of the same object type, as claimed in the present invention.

Accordingly, claim 1 is not anticipated by Williams.

#### Claim 30

Claim 30 further recites “finding the first set of instances of components of the object type, each of the first set of instances corresponding to a corresponding one of the set of records” and “finding the second set of instances of components of the object type, none of the second set of instances corresponding to any of the set of records”. These limitations are not found in Williams.

Williams does not teach or suggest a method of finding a set of component instances that correspond to the records for update and finding another set of component instances that do not correspond to the records for insertion. Thus, claim 30 is patentable over Williams.

#### Claim 31

Claim 31 further recites “the first and second sets of instances of components are instances of components of a same object”. These limitations are not found in Williams. Thus, claim 31 is patentable over Williams.

#### Claim 6

Applicant respectfully submits that the Office Action is in mistake in asserting that “The other limitations of claim 6 are also considered to be directed toward substantially the same subject matter as claim 1.”

In claim 1, what is updated is “the set of records of the database”. In claim 6, what is updated is “instances of components of the instance”. Records of a database are clearly different from component instances of an object instance. Similarly, in claim 1 what is inserted is records; and in claim 6 what is inserted is instances of components.

Applicant respectfully submits that updating a database based on objects is different from updating objects based on a database. The Office Action mistakenly assumed that claim 6 is directed toward substantially the same subject matter as claim 1 and rejected claim 6 based on the reasons stated for rejection of claim 1. Thus, the rejection of claim 6 is improper.

#### Claim 28

The portion of Williams relied upon for the rejection of claim 28 shows "... involved in the creation (or insertion, update and delete) of the PRO-OBJECT." (Col. 73, lines 50-51, Williams). Thus, it is clear that the process repeated in Williams is for the creation (or insertion, update and delete) of an object, not for the creation (or insertion, update and delete) of records of a database.

In claim 28, what is updated and inserted are records of the database. Thus, Williams (Col. 73, lines 50-51, Williams) does not anticipate the additional limitation recited in claim 28.

#### Other Claims

Independent claims 11, 16, 17 and 22 recite similar limitations as those discussed above. Thus, independent claims 1, 6, 11, 16, 17 and 22 are patentable over Williams at least for the above reasons.

Examiner rejected claims 5, 10, 15, 21 and 26 under 35 U.S.C. §103(a) as being unpatentable over Williams in view of Cseri. Applicant respectfully disagrees.

Cseri was relied upon for the additional limitations recited in claims 5, 10, 15, 21 and 26. The combination of Williams and Cseri does not teach or suggest each and every aspect of the independent claims 1, 6, 11, 17 and 22, as discussed above. Claims 5, 10, 15, 21 and

26 depend from claims 1, 6, 11, 17 and 22. Thus, at least for the above reasons, claims 5, 10, 15, 21 and 26 are patentable over Williams in view of Cseri.

The remaining claims depend from at least one of the independent claims discussed above, and therefore include at least some of the distinguishing claim limitations as discussed above. As a result, the remaining claims are also patentable.

### CONCLUSION

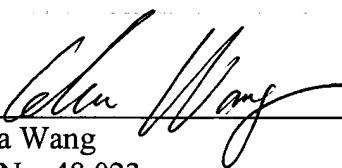
Applicant respectfully submits that the pending claims are patentable over the cited references. If the Examiner believes a telephone conference would expedite or assist in the allowance of the present application, the Examiner is invited to call at (408) 720-8300.

Authorization is hereby given to charge our Deposit Account No. 02-2666 for any charges that may be due. Furthermore, if an extension is required, Applicant hereby requests such extension.

Respectfully submitted,

BLAKELY, SOKOLOFF, TAYLOR & ZAFMAN LLP

Date: 8/17, 2005

  
Lehua Wang  
Reg. No. 48,023

12400 Wilshire Boulevard  
Seventh Floor  
Los Angeles, California 90025-1026  
(408) 720-8300